

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Jacquelyn Owens	:	Chapter 13
	:	Case No.: 24-14349-PMM
Debtor(s)	:	

OBJECTION TO CERTIFICATION OF DEFAULT

Debtor, Jacquelyn Owens, by and through their undersigned counsel Brad J. Sadek, hereby objects Freedom Mortgage Corporation's Certification of Default on the following basis:

It is Denied that Debtor/Borrower, Jacquelyn Owens, is delinquent on April 15, 2025, stipulation. If the Debtor/Borrower is delinquent, she shall be current prior to the hearing on the lender's instant Certification of Default.

WHEREFORE, Debtor respectfully requests this Honorable Court to DENY Movant's Order requesting Relief from the Automatic Stay.

Dated: June 24, 2025

/s/ Brad J. Sadek, Esq.

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